

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Montana State Office
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Billings, Montana 59107-6800
<http://www.mt.blm.gov/>

In Reply To:

1112 (930.KV) P

June 14, 2004

EMAIL TRANSMISSION – 6/15/04
Information Bulletin No. MT-2004-073

To: Field Manager, Dillon Field Office

From: Deputy State Director, Division of Support Services

Subject: CASHE Findings Status Update

DD: 07/16/2004

Washington Office Instruction Memorandum No. 2004-185 (Attachment 1) was issued to all field officials on May 26, 2004. It requests the field to provide an update on the implementation status of recommendations or other corrective actions related to findings from Compliance Assessment – Safety, Health, and the Environment (CASHE) audits.

Included as Attachment 2 are the findings that were identified during the last CASHE inspection at your facility. The list reflects findings that are not complete based on your last status report to the contractor.

This request is for an update of the following information, where applicable: 1) the status of corrective action for each finding; 2) the point(s) of contact (full names of individuals, not a program, committee, office, or building owner); and 3) facility name changes.

It is imperative that you use the following descriptives to ensure that you are credited for correcting the CASHE deficiencies. Findings are not considered complete unless completion is explicitly stated by the respondent. Listed below are examples of acceptable terms to be used when you describe the status of your incomplete findings:

- unscheduled
- completed in (date if available)
- implemented in (date if available)
- scheduled for completion by (date)
- funding requested; anticipate completion by (scheduled date of completion)
- preliminary planning; anticipate completion by (scheduled date of completion)

- under design; anticipate completion by (scheduled date of completion)
- under construction; anticipate completion by (scheduled date of completion)
- N/A (e.g., if no longer relevant because a facility no longer exists).

(Note: If a finding is no longer relevant, please explain why.)

For those who respond electronically, do not rename or convert the files to a different software as file integrity is critical to the contractor's ability to track the data. If you prefer not to respond electronically, you should print the documents and update them by hand.

You are asked to send the completed table to Karilynn Volk, MT-930, as soon as possible, but no later than **Friday, July 16, 2004**. A consolidated response will be sent to the contractor by July 30, 2004.

Offices with incomplete CASHE findings are to continue to submit quarterly status update reports in accordance with Instruction Memorandum No. MT-2004-018.

If you have questions, please contact Karilynn Volk, at 406-896-5190, or Lisa Engelmann, at 406-896-5193.

Signed by: Sandra L. Guches

Authenticated by: Aleta Zahorodny (MT-930)

2 Attachments

- 1- WO IM 2004-185 (3 pp in its entirety)
- 2- Dillon Field Office CASHE Findings (4 pp)

cc:

(MT-050), Bob Gunderson, CDSO

(MT-073), Vicki Gillam, AO

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

May 26, 2004

In Reply Refer To:
1112, 1703 (360) P
Ref. IM No. 2003-167

EMS TRANSMISSION 06/04/2003
Instruction Memorandum No. 2004-185
Expires: 09/30/2005

To: All Field Officials

From: Assistant Director, Minerals, Realty, and Resource Protection

Subject: Facility Compliance Management and Tracking of CASHE Findings

DD: 07/31/2004

Program Areas: Facility Compliance and Safety.

Purpose: This Instruction Memorandum (IM) asks the Field to provide an update on the implementation status of recommendations or other corrective actions related to findings from Compliance Assessment - Safety, Health, and the Environment (CASHE) audits. This information will be used to identify projects for funding from infrastructure improvements money designated in Fiscal Year (FY) 2005 for CASHE corrective actions. In addition, the Bureau of Land Management (BLM) will make use of this data to:

- manage and minimize risk related to facility compliance, and
- identify future funding, policy, and training needs.

Accurate information about facility compliance is necessary for BLM to achieve its strategic planning goal to "Improve Public Safety and Security and Protect Public Resources from Damage."

Background: In FY 2003, 72 percent of BLM's organizational units were rated in good safety, health, and environmental condition. This performance was based on information received in response to Washington Office IM No. 2003-167, which asked the Field to update the status of unresolved CASHE findings. For the FY 2004 Annual Performance Report, organizational units will be considered in good condition if they have one or less incomplete corrective action related to a high priority CASHE finding. The good condition standard will be zero incomplete high priority findings in FY 2005 and subsequent Fiscal Years.

ATTACHMENT 1

The performance measurement data specification that defines high priority CASHE findings and describes how the data will be used is located at: <http://web.wo.blm.gov/ms1/>. The performance goal for FY 2004 is 74 percent of BLM organizational units be in good safety, health, and environmental condition.

Policy/Action: Updating Status of CASHE Recommendations/Corrective Actions:

Organizational units (i.e., Washington Office, State and Field Offices, National Centers) that have had a CASHE audit between October 1993 and February 27, 2004 are asked to update the status of recommendations/corrective actions. This data is to be reported on the spreadsheet that was transmitted separately to every Field Office safety officer and HAZMAT coordinator by their State Office Safety Manager or HAZMAT Program Lead. The spreadsheets and instructions for updating them will be transmitted to each State Office Safety Manager and HAZMAT Program Lead by May 17, 2004 via email. In addition, comments on the status of CASHE findings from draft CASHE reports for audits completed through June 24, 2004, will be incorporated into the status update database.

Implementation of CASHE Recommendations/Corrective Actions: Consistent with available budget resources and other programmatic concerns, organizational units are to implement CASHE recommendations/corrective actions and/or request funding for implementation within one year of the audit. Please note: the instructions for completion of the FY 2004 CASHE Status Update clarify that CASHE corrective actions having Hazard Abatement Plans in place that are prepared and approved in accordance with BLM Manual Handbook 1112-1, Safety and Health Management are considered complete provided funding for their implementation has been formally programmed for completion within two years.

Timeframe: Please return the updated spreadsheets by July 31, 2004. The due date for the status update is earlier than last year's because the Department is requiring that BLM provide its FY 2004 Annual Performance Report data earlier (i.e., first week of October 2004).

Please note: Organizational units that do not respond by July 31, 2004, will:

- have their corrective actions shown as incomplete,
- negatively affect the FY 2004 performance for the CASHE Performance Measure, and
- be ineligible for deferred maintenance funding for CASHE corrective actions.

Budget Impact: None.

Manual/Handbook Sections Affected: None.

Coordination: National Safety Office (WO-740).

Contacts: Ken Morin, Protection and Response Group (WO-360), 303-236-6418; Phyllis McKoy, Occupational Safety and Health (WO-740), 202-501-2788.

Signed by:

Bob Anderson

Acting Assistant Director

Minerals, Realty, and Resource Protection

Authenticated by:

Barbara J. Brown

Policy & Records Group, WO-560

Montana

Organizational Unit: Dillon Field Office
Assessed Facility: Dillon Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
ELEC-03-001	A table with a printer on it is blocking access to the electrical panel in the GIS Room.	03/26/2004	No	N/A	4	A) Move items that restrict access to the electrical panel; and B) Post a sign on the panel informing employees to keep the area within 3 feet clear.	Susan James	Scheduled for completion by September 30, 2003.	
ELEC-03-003	Electricity is provided to a desktop computer at Ennis Field Station via an extension cord.	03/26/2004	No	N/A	3	Install a permanently wired electrical receptacle that can be used to power the desktop computer.	Not provided. This finding was added to the final report after POCs were provided for draft findings.	Not provided. This finding was added to the final report after status was provided on draft findings.	
FIRE-03-001	Fire extinguishers at the Field Office and Ennis Field Station are not inspected monthly or are not properly mounted or signed.	03/26/2004	No	N/A	4	A) Initiate internal monthly fire extinguisher inspections and document these monthly inspections on fire extinguisher tags; B) Mount all fire extinguishers; and C) Post signs identifying the locations of all fire extinguishers..	Bob Gunderson, Susan James	Scheduled for completion by September 3, 2003.	
FIRE-03-002	A fire extinguisher is not properly mounted and signed in the at Ennis Field Station.	03/26/2004	No	N/A	3	A) Obtain and mount a fire extinguisher on the wall; and B) Post a sign identifying the location of the fire extinguisher.	Susan James	Scheduled for completion by September 3, 2003.	
HAZMAT-03-001	Gasoline is stored in an open container at Ennis Field Station.	03/26/2004	No	N/A	3	Replace or fabricate the cap on the plastic gasoline container.	Susan James	Scheduled for completion by September 30, 2003.	
HAZMAT-03-002	Fire extinguishers are not provided outside of fuel sheds at the Field Office or Red Mountain Campground.	03/26/2004	No	N/A	3	A) Obtain and mount fire extinguishers not more than 10 feet from the doors of the fuel sheds (the extinguishers can be mounted directly on the outside of the buildings); and B) Post signs identifying the locations of the fire extinguishers.	Susan James	Scheduled for completion by September 30, 2003.	
HAZMAT-03-003	The propane storage tank for the Red Mountain Campground host is not labeled with "PROPANE" or the appropriate fire hazard warnings.	03/26/2004	No	N/A	4	Label the propane tank "PROPANE - NO SMOKING WITHIN 15 FEET."	Not provided	Not provided	

Montana

Organizational Unit: Dillon Field Office
Assessed Facility: Dillon Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
HAZMAT-03-	Small propane cylinders are stored inside flammable storage cabinets throughout Field Office facilities.	03/26/2004	No	N/A	3	Remove all small propane cylinders from flammable storage cabinets, and areas; and store them on shelves.	Not provided. This finding was added to the final report after POCs were provided for draft findings.	Not provided. This finding was added to the final report after status was provided on draft findings.	
HWGEN-03-001	Fluorescent lamp tubes are accumulated and disposed improperly at the Field Office and Ennis Field Station.	03/26/2004	No	Class III	N/A	Provide the building owner with a copy of this finding and request that the following be implemented: A) Determine if there is a local recycling facility that will accept spent tubes (also inquire if they will accept low-mercury tubes); B) If not, contact the local landfill to determine if it accepts spent fluorescent tubes in a CESQG's trash and in what quantity (also inquire if they will accept low-mercury tubes), and document all discussions; C) Purchase tubes in a box and store both new and spent tubes in their original box; D) Recycle or dispose of the entire box when it is full of spent tubes; E) Begin the transition to low-mercury or long-life tubes; F) Educate all personnel who perform maintenance activities on the proper storage and disposal of spent fluorescent lamp tubes; and G) Determine whether the Ennis building owner will replace spent lamps or provide Field Station personnel with a safe means of performing this task.	Angie Morse	Scheduled for completion by September 30, 2003.	

Montana

Organizational Unit: Dillon Field Office
Assessed Facility: Dillon Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
HWGEN-03-002	There is no system in place for the proper disposal of paint thinner at the Ennis Field Station.	03/26/2004	No	Class IB	N/A	A) Switch to latex-based paints or use disposable paint brushes, eliminating the use of paint thinner and the generation of used paint thinner; or B) If thinner use is unavoidable, instruct all personnel who use paint thinner to pour it back into the original container and continue to reuse it until it is no longer effective; and C) Turn the spent paint thinner in to the Field Office HAZMAT Coordinator for proper disposal as hazardous waste.	Not provided. This finding was added to the final report after POCs were provided for draft findings.	Not provided. This finding was added to the final report after status was provided on draft findings.	
MED-03-001	First-aid kits at the Field Office contain expired medications.	03/26/2004	No	N/A	3	Replace all expired medications.	Bob Gunderson	Scheduled for completion by September 30, 2003.	
MHS-03-001	Bundles of pressure-treated wood stored in the Field Office wareyard are not secure.	03/26/2004	No	N/A	4	A) Install guard posts or barricades and store wood bundles and other materials with the potential to roll (e.g., culvert, fence posts), behind them; and B) If there is room available in the yard, do not stack bundles of wood.	Chris Nemeth	Scheduled for completion by September 30, 2003.	
PEST-03-001	A backpack sprayer used to apply pesticides is stored at Ennis Field Station.	03/26/2004	Yes	Class III	N/A	Label all equipment used for the application or mixing of pesticides "CONTAMINATED WITH PESTICIDES" to prevent its use for other purposes.	Not provided. This finding was added to the final report after POCs were provided for draft findings.	Not provided. This finding was added to the final report after status was provided on draft findings.	
PPE-03-001	The pump house at Red Mountain Campground poses a health risk to employees because it is infested with rodents.	03/26/2004	No	N/A	3	Clean the pump house in accordance with the State Office Hantavirus protection plan, and seal all floor openings.	Susan James	Scheduled for completion by September 30, 2003.	

Montana

Organizational Unit: Dillon Field Office
Assessed Facility: Dillon Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
PW-03-001	A well at Red Mountain Campground has not been used in several years and has not been properly abandoned.	03/26/2004	No	Class IB	N/A	Contract for the well to be properly abandoned in accordance with all applicable State regulations.	Chris Nemeth	Scheduled for completion by June 30, 2004. Funding has been requested.	
THS-03-001	Unlabeled containers are stored at the Field Office and at Ennis Field Station.	03/26/2004	Yes	N/A	4	A) Label all containers as to content, appropriate hazard warnings (e.g., flammable), and target organ effects; and B) Label the water tanks "NONPOTABLE WATER."	Jim Karamanos	Scheduled for completion by September 30, 2003.	
THS-03-002	Fluid barrier kits are not included in first-aid kits at the Field Office.	03/26/2004	No	N/A	3	Order fluid barrier kits and incorporate them into all first-aid kits.	Bob Gunderson	Scheduled for completion by September 30, 2003.	
WWS-03-001	Empty boxes are stored in the Field Office warehouse loft over storage rooms and an office, and a load limit has not been posted.	03/26/2004	No	N/A	4	A) Obtain a professional determination of the load limits of all storage areas above occupied portions of the buildings, and post the load limits in each area (total capacity and weight per square foot capacity); and B) Determine whether the materials currently stored in the loft are in compliance with the load limit, remove materials if necessary, or modify the quantity of materials stored in the lofts accordingly; or C) Post signs on lofts prohibiting storage in the loft, where appropriate.	Bob Gunderson	Scheduled for completion by December 31, 2003.	
WWS-03-002	A telephone cord in the Ennis Field Station constitutes a tripping hazard.	03/26/2004	No	N/A	3	Reroute the cord or cover it with a protective rubber strip.	Susan James	Scheduled for completion by September 30, 2003.	